

6. Services Currently Provided to PBCOM

- a. Prior to the issuance of the Non-Accounting Safeguards First Report and Order, PBCOM had expressed its intention to purchase services from PB in conformity with the express applicable structural, transactional, and non-discriminatory treatment requirements of Section 272(b)(1), (2), and (5), (c), (e), and (g).
- b. In reliance upon the express terms of Section 272, PBCOM contracted with PB to receive, and has received on an as-needed basis, certain services specified in the PB Cost Allocation Manual or set forth in PB's tariffs (collectively, the "PB-Provided Services"). PBCOM is actually obtaining the following services from PB:
 - i. **Benefit Plan Services:** This service includes general daily administration, interpretation and implementation of the benefit plan services common to all PTG entities, the maintenance and provision of plan texts as required by Federal Law (ERISA), and the written communications to active employees and retirees on matters that affect their interest in the plans and law.
 - ii. **Centralized Distribution Center Services:** These services include preparing and addressing materials for mass distribution to company employees and the maintenance of large voice mail box lists.
 - iii. **Computer Security Services:** This service includes support for investment and cost processing, which includes firewall development, maintenance and network surveillance, supporting Local Security Administrators (LSAs), maintaining and updating the computer security database, methods and procedures, security consulting and compliance and investigative services.
 - iv. **Consulting Services Information Systems Development:** This service includes consulting and related activities to render assistance to PBCOM to create system requirements to support the information systems and to

develop systems, manage vendors and long term information systems operations.

- v. **Consulting Services Marketing Support:** This service includes the provision of marketing support and other related activities, including the provision of advice and counsel on distribution channels for joint marketing, the development of requirements for system support for joint marketing, and the development of methods and procedures for joint marketing of client services.
- vi. **Data Center Operations, Systems Support and Planning Services:** This service includes Data Center Planning, Data Center Operations and Data Center Systems Support.
- vii. **Disability Assistance Program:** This services is designed to assist employees in the recover from disability caused by illness, off-duty accidents, or anticipated disability.
- viii. **Information Directory Services:** This service is the maintenance and updating of a personnel database that includes the Official Company Directory, Regional Administrative Call Handling - Employee Locator (RACHEL) - (Operator Assisted) and Touch-Tell Directory (Automated Dialing).
- ix. **Mail and Message Services:** This service includes four major functions that are provided or available on a daily basis: motorized, primary, secondary and centralized mail.
- x. **Project Management Services:** This service includes project management services which include customer consultations, opportunity assessments, project decisions analysis and project implementation.
- xi. **Tariffed telecommunication services.**

- D. **PB and PBCOM COMPLY WITH THE SEPARATE OFFICERS, DIRECTORS, AND EMPLOYEES REQUIREMENTS OF THE ACT**
1. PB and SBLD have separate officers, directors and employees.
 - a. No officer of PB will be an officer of SBLD, and as long as the applicable requirements of Section 272 remain, no officer of PB will simultaneously serve as an officer of SBLD.
 - b. No director of PB will be a director of SBC, and as long as the applicable requirements of Section 272 remain, no director of PB will also simultaneously serve as a director of SBLD.
 - c. No PB employee will simultaneously be an employee of SBLD, and as long as the applicable requirements of Section 272 remain, no employee of PB will simultaneously be employed by SBLD.
 2. PB and PBCOM have separate officers, directors and employees.
 - a. No officer of PB will be an officer of PBCOM, and as long as the applicable requirements of Section 272 remain, no officer of PB will simultaneously serve as an officer of PBCOM.
 - b. No director PB will be a director of PBCOM, and as long as the applicable requirements of Section 272 remain, no director of PB will also simultaneously serve as a director of PBCOM.
 - c. No PB employee will simultaneously be an employee of PBCOM, and as long as the applicable requirements of Section 272 remain, no employee of PB will simultaneously be employed by PBCOM.

E. PB COMPLIES WITH THE ACCOUNTING REQUIREMENTS AND WILL ACCOUNT FOR AFFILIATE TRANSACTIONS AS REQUIRED

1. PB currently maintains books, records, and accounts that are separate from the books, records, and accounts of SBLD. PB has and will continue to account for all transactions between SBLD and PB in accordance with all applicable requirements of Parts 32 and 64 of the FCC's accounting rules, as modified by the rules adopted by the FCC in the Accounting Safeguards Report and Order, Appendix B. To date, PB has not provided SBLD any services. If SBLD obtains services from PB, such transactions will be reduced to writing and PB and SBLD will account for any affiliate transaction between SBLD and PB in accordance with the rules adopted by the FCC in the Accounting Safeguards Report and Order, Appendix B. SBLD's capital and expense accounts are separate from those of PB.

2. PB currently maintains books, records, and accounts that are separate from the books, records, and accounts of PBCOM. PB has and will continue to account for all transactions between PBCOM and PB in accordance with all applicable requirements of Parts 32 and 64 of the FCC's accounting rules, as modified by the rules adopted by the FCC in the Accounting Safeguards Report and Order, Appendix B. When PBCOM obtains services from PB, such transactions will be reduced to writing and PB and PBCOM will account for any affiliate transaction between PBCOM and PB in accordance with the rules adopted by the FCC in the Accounting Safeguards Report and Order, Appendix B. PBCOM's capital and expense accounts are separate from those of PB.

F. PB WILL PARTICIPATE IN THE BIENNIAL AUDIT

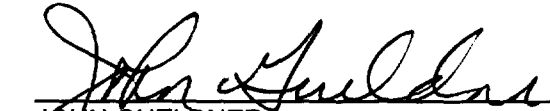
1. PB will coordinate, obtain, and pay for a joint federal/State audit, together with SBLD and any other affiliated, Section 272 company, every two years. The audit will be conducted by an independent auditor to verify compliance with the requirements of Section 272 and the FCC's regulations promulgated thereunder, including the separate accounting

requirements under Section 272(b). The first such audit will begin at the close of the first full year of operations. The independent auditor will be selected in accordance with the FCC's requirements specified in the Accounting Safeguards Report and Order and Sections 53.209 and 53.211 of the Commission's rules. PB will coordinate with the federal/State joint audit team, as described in Section 53.209(d) of the Commission's rules. PB's letter of engagement with the independent auditor will require that the audit be performed consistent with all applicable regulatory requirements, including the specific requirements described in Section 53.209(b) of the Commission's rules. PB will comply with the procedures described in Sections 53.211 and 53.213 of the Commission's rules.

2. PB will require the independent auditor to submit the results of the audit in accordance with the requirements of Section 53.213 of Commission's rules.
3. PB, together with its affiliates, including SBLD, PBCOM, SBC, SWBT and NB will provide the independent auditor, the FCC, and the Oklahoma Corporation Commission with access to financial records and accounts necessary to verify compliance with Section 272 and the regulations promulgated thereunder.
4. PB will require the independent auditor to provide the FCC and Oklahoma Corporation Commission with access to working papers and supporting materials relating to this audit consistent with Section 53.213(a)(1) of the FCC's rules and consistent with the proprietary information concerns set forth in the Accounting Safeguards Report and Order.

H. CONCLUSION OF TESTIMONY

The foregoing Affidavit is true and correct to the best of my knowledge, information, and belief. This concludes my Affidavit.



JOHN GULDNER
VICE PRESIDENT-REGULATORY
PACIFIC BELL

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

In the matter of)	
)	
Application of SBC Communications Inc.,)	
Southwestern Bell Telephone Company,)	CC Docket No. _____
and Southwestern Bell Communications)	
Services, Inc., for Provision of In-Region,)	
InterLATA Services in Oklahoma)	

AFFIDAVIT OF ELIZABETH A. HAM

I, ELIZABETH A. HAM, being duly sworn, deposes and states as follows:

1. My name is Elizabeth A. Ham. My business address is One Bell Center, Room 15-Z-1, St. Louis, Missouri 63101. I am Executive Director-Interconnection & Resale Technical Implementation for Southwestern Bell Telephone Company ("SWBT"). In this position I am responsible for the development of procedures which are used by SWBT personnel to process Competing Local Exchange Carriers ("CLEC") service requests and for assisting the Customers Services organization in the implementation of CLEC contracts in a manner consistent with State commission and Federal Communications Commission ("FCC") rules and regulations governing local exchange competition. In my most recent position, I have led a multidisciplinary team in the development of access to SWBT's Operations Support System ("OSS") functions. I also represent our Customer Services organization in negotiations with CLECs.

EDUCATION AND PROFESSIONAL EXPERIENCE

2. I received a B.S. degree in 1973 from Arkansas Polytechnic University in Russellville, Arkansas. I have 26 years experience with SWBT. I have held numerous jobs in our Operator Services, Network Operations and Customer Services organizations. I was selected by SWBT to receive extensive training in Statistical Process Improvement methods, and I am one of our company's internal Quality Consultants.

PURPOSE OF AFFIDAVIT

3. The purpose of my affidavit is to describe how SWBT complies with the Telecommunications Act of 1996 ("the Act") and the FCC's requirements for providing CLECs with nondiscriminatory access to its OSS functions. I will discuss the OSS functions that SWBT makes available to its own retail service representatives and to the CLECs for pre-ordering, ordering, provisioning, maintenance and repair, and billing. I will demonstrate that SWBT has met its obligations to provide CLECs with access to its OSS functions that is "at least equivalent" to that it provides to itself. Further, I will demonstrate that SWBT is willing to and has, in fact, negotiated in good faith to provide CLECs with forms of access to its OSS functions that are not available today and to implement them where technically feasible. SWBT has collectively exceeded its obligations by making available to CLECs multiple interface choices within each function, thus enabling them to choose the interfaces that best meet their business needs.

BACKGROUND

4. Section 251(c)(3) of the Act specifies that incumbent local exchange carriers must provide “nondiscriminatory access to network elements on an unbundled basis.” On August 8, 1996, the Federal Communications Commission (“FCC”) released its First Report and Order in CC Docket No. 96-98 (“First Report and Order”) to implement the access and interconnection provisions of the Act. The FCC stated that “... in order to comply fully with section 251(c)(3) an incumbent LEC must provide, upon request, nondiscriminatory access to operations support systems functions for pre-ordering, ordering, provisioning, maintenance and repair, and billing of unbundled network elements under section 251(c)(3) and resold services under section 251(c)(4).” Further, the FCC indicated that “... it is reasonable to expect that by January 1, 1997, new entrants will be able to compete for end user customers by obtaining nondiscriminatory access to operations support systems functions.” First Report and Order at ¶ 525.
5. In its Second Order on Reconsideration, CC Docket No. 96-98, (December 13, 1996) (“Second Order on Reconsideration”), the FCC emphasized that “[b]y January 1, 1997, to the extent that an incumbent LEC provides electronic pre-ordering, ordering, provisioning, maintenance and repair, or billing to itself, its customers, or other carriers, the incumbent LEC must provide at least equivalent electronic access to requesting carriers in the provision of unbundled network elements or services for resale....” Second Order on Reconsideration at ¶ 9.

6. SWBT began the planning process for CLEC access to its OSS functions in September of 1995, with the establishment of eight teams dedicated to an analysis of the “competitive checklist” items that Congress was considering enacting into law. I led the Access to Support Systems and Functions (ASSF) team, which was charged with determining ways in which SWBT would interface with the CLECs. The ASSF team was divided into four sub-teams, one of which was called Service Activation/Assurance (SA/A). The SA/A team was responsible for developing access to SWBT’s OSS functions which the FCC later described in its First Report and Order as pre-ordering, ordering, provisioning, maintenance and repair, and billing. Our team recognized very early that it would be of enormous benefit to both SWBT and the CLECs if we were able to transact business between us electronically, in order to save human resources. As part of the planning process, the team reviewed regulatory filings related to electronic interfaces from prospective CLECs in other ILEC states and considered their requirements in our planning effort. The SA/A team spent over four months gathering data and documenting their work and produced a planning document in December of 1995. That plan enabled SWBT to get a head start on developing and enhancing electronic interfaces for access to its OSS.
7. Between the time the Act was signed into law on February 8, 1996 and the FCC issued its First Report and Order on August 8, 1996, SWBT had already entered into negotiations and reached interconnection agreements with several CLECs. Throughout this process, SWBT was able to share its plans and receive feedback from the CLECs on their needs for

electronic interfaces. Enhancements were made to the front-end systems with which the CLECs will directly interface. Many changes (i.e., reports, edits, data stores, etc.) also were made to several "back-office" systems so that orders for resold services and unbundled network elements by CLECs would be fully processed and provisioned. Finally, a number of modifications to OSS software were made throughout the period from September to December 1996 in order to accommodate expected CLEC competition. Thus, by the time the First Report and Order was issued, SWBT was well on its way to developing those electronic interfaces which were necessary to provide CLECs with nondiscriminatory access to its OSS functions by January 1, 1997.

8. This development work and the enhancements to SWBT's OSS functions themselves have had, and continues to have, a sizable financial impact upon SWBT. Since enactment of the Act, over \$1.5 million in capital funds were spent to acquire hardware necessary to provide nondiscriminatory access to SWBT's OSS functions and to increase its processing capacity. Concurrently, over \$2.9 million in expense funds were spent by our Information Services organization alone to make enhancements to existing systems and to develop new applications. These figures are conservative, in that they do not reflect expenses incurred by personnel in other departments who were involved in the gathering of requirements and documentation, as well as in test case preparation and validation.
9. SWBT's approved Information Services capital budget for 1997 includes \$175,000 for hardware to increase the capacity of one of our applications that will process high-volume

pre-ordering transactions. Our actual capital expenditures will likely exceed our original budget if we obtain CLEC forecast data and system usage that triggers the purchase of additional hardware to increase system capacities. In addition, the approved expense budget for 1997 contains approximately \$ 7.5 million for Information Services personnel to continue their development efforts in providing access to SWBT's OSS functions, and for ongoing personnel costs associated with support of the Remote Access Facility ("RAF") and Help Desk.

ACCESS TO OPERATIONS SUPPORT SYSTEMS FUNCTIONS

10. The RAF was created to provide CLECs with a point of entry for gaining access to SWBT's OSS functions. Plans were finalized to build the RAF during August 1996. Equipment was ordered in September and October, so installation could occur during November, 1996. The RAF has been initially equipped with 96 simultaneous dial-up connections (both analog and ISDN) and 24 private line connections. A security "firewall" has also been put into place to prevent unauthorized access to SWBT's internal communications network. Internal testing of the RAF facility began in December, 1996. AT&T established direct connectivity to SWBT's RAF in February 1997 and we are currently in discussions with several other CLECs which have expressed their intention to start utilizing the RAF within the next several weeks.
11. Two rate elements for CLEC access to SWBT's OSS functions have been developed to recover the costs incurred by SWBT for providing access to pre-ordering,

ordering/provisioning, maintenance/repair and billing functions. The rate elements have been established as monthly charges: one for connectivity to the Remote Access Facility (RAF) and the other for ongoing support to system access.

12. The RAF rate element is based upon costs for equipment, facilities and the security firewall required to enable CLECs to access SWBT electronic interfaces. Also included are ongoing costs for operations personnel to support the RAF. This rate element has been established as a monthly charge per port, for either “Dial Up” or a “Direct Connection”. A port may provide system access to functions for all SWBT in-region states. CLECs are required to provide their own facility (e.g., private line) or call connections for access to the RAF.
13. The System Access rate element consists of the ongoing application and security support, and also includes staffing for Help Desk coverage (7 days a week, 24 hours a day) to assist CLECs with electronic interface issues. This monthly System Access charge will apply on a per state basis. I will discuss the Help Desk in more detail in paragraph 17.

SUPPORT ORGANIZATIONS

14. In order to facilitate nondiscriminatory access to SWBT’s OSS functions, SWBT has established a number of support organizations specifically designed to serve the CLECs. These support organizations include the Local Service Provider Service Center (“LSPSC”), Local Service Provider Center (“LSPC”), and Help Desk.

15. The LSPSC was created to provide the CLECs with a single point of contact within SWBT for pre-ordering, ordering/provisioning, billing, and collection. The affidavit of Nancy J. Lowrance describes the structure and operation of the LSPSC in more detail.
16. The LSPC was created to provide the CLECs with a single point of contact for installation, maintenance and repair activities, twenty-four (24) hours a day, seven (7) days a week.. The affidavit of Linda D. Kramer describes the structure and operation of the LSPC in more detail.
17. On February 3, 1997, the SWBT Help Desk began to provide support to CLECs. This Help Desk provides assistance to the CLECs by: 1) answering questions regarding access to SWBT systems and applications; and, 2) attempting to resolve information services problems experienced by the CLECs. The goal of the Help Desk is to be able to provide a single point of contact to the CLECs for resolution of their OSS interface problems and questions. At a minimum, the Help Desk will provide these services Monday through Friday from 8 a.m. to 5 p.m.; all other days and hours will be covered via pager that is activated by voice mail so that Help Desk personnel will be available either in person or on call twenty-four (24) hours a day, seven (7) days a week.

OSS FUNCTIONS

18. The OSS functions SWBT must make accessible to CLECs are pre-ordering, ordering, provisioning, repair and maintenance, and billing. SWBT is providing CLECs with multiple choices of electronic interfaces for access to its OSS functions depending upon their business needs, which may vary based upon transaction volumes and the information services resources of their company. SWBT will make additional interfaces available as negotiated and provided for in interconnection agreements with individual CLECs.
19. In the following paragraphs, I will describe each of the interfaces that SWBT is making available for access to each OSS function. Attachment A to my affidavit provides an overview of generic text and flow diagrams that describe the electronic interfaces SWBT is making available to CLECs. Attachment B provides a summary of all the electronic interfaces discussed below and includes the physical interface, hardware and software requirements, as well as the hours of operation for each electronic interface.

Pre -Ordering

20. Pre-ordering involves the exchange of information between SWBT and a CLEC about a current or potential customer during the negotiation phase with that customer, which will enable the CLEC to submit an accurate service request to SWBT. Pre-ordering capabilities include address verification, customer service record information, services and features availability, telephone number assignment, due date availability (resale), dispatch requirements (resale), PIC availability, channel facility assignment verification (unbundled

network elements) and network channel/interface verification (unbundled network elements).

21. SWBT provides CLECs with a choice of three electronic interfaces for access to its OSS pre-ordering capabilities: Easy Access Sales Environment ("EASE"), Verigate, and DataGate. All three electronic interface options provide CLECs with "real time" access on a dial-up or direct connection basis. CLECs can choose the electronic interface (s) that best suits their individual business objectives and systems architecture.
22. EASE is an on-line system that was developed as a service order negotiation tool for SWBT's own retail service representatives, and is currently used by them with both residence and business customers. Residence EASE is used for pre-ordering and ordering for customers with up to 5 lines. Business EASE is used for pre-ordering and ordering for customers with up to 30 lines. Both residence and business EASE are now available to CLECs for pre-ordering resold services. It will afford CLECs precisely the same access to pre-ordering capabilities that SWBT offers to its retail service representatives. EASE is in English and enables CLECs to access pre-order functions to accomplish straight conversions, establish new accounts, as well as to make changes to or to disconnect the customer's service.
23. Verigate is a SWBT graphical user interface that operates with Windows™ and provides CLECs with access to pre-ordering functions available from SWBT's "back office"

systems. It was designed for CLECs that do not want to use EASE or to pursue development of their own graphic user interface, and are not ready to use DataGate.

Verigate provides CLECs with pre-ordering capabilities for resold services and unbundled network elements.

24. DataGate is a SWBT gateway which provides an application to application electronic interface for those CLECs with their own graphical user interface. It provides CLECs with pre-ordering capabilities for resold services and unbundled network elements. Sprint has been testing DataGate since the end of January 1997. AT&T has also been testing DataGate since March 13, 1997.
25. The pre-ordering electronic interfaces described above were developed by SWBT. National standards for electronic interfaces for pre-ordering have not yet been developed, since all substantive standards work to date has focused on ordering functions. Nevertheless, SWBT has and will continue to participate in national forums and standards committees to develop standards necessary for CLECs to effectively exchange information with SWBT. When national standards are developed for the pre-ordering function, assuming they are different from that which SWBT is providing today, SWBT will make such an interface available to those CLECs that request it.

Ordering/Provisioning

26. Ordering involves the actual transmittal of the service request from the CLEC to SWBT with the necessary information for issuance of a service order. Provisioning involves the exchange of information whereby the CLEC has the capability to obtain order confirmation data, service order status, and service order completion information. Ordering/provisioning capabilities include order receipt, the return of acknowledgments, editing for valid information, the return of error information, order confirmation and the return of service order completion status.
27. SWBT provides CLECs with a choice of three electronic interfaces for access to its OSS ordering/provisioning capabilities: EASE, an Electronic Data Interchange ("EDI") gateway, and LSR EXchange system (LEX). SWBT also provides a method (described in paragraph 34) for manually interfacing with it for those CLECs that do not want to utilize an electronic interface for ordering/provisioning.
28. EASE is now available to CLECs for ordering and provisioning resold services. EASE enables the CLECs to perform conversions, new orders, change orders, outside moves and disconnects of residence customers, and most business customers (up to 30 lines). As noted above, EASE is precisely the same electronic interface that SWBT's own retail service representatives use in pre-ordering and ordering/provisioning service for both residence and business customers. The proven capabilities of the EASE system provide a robust service negotiation /pre-ordering/ordering/provisioning application for CLECs.

SWBT will provide CLECs with a daily feed of distributed service order information that will enable them to mechanically populate their billing system and synchronize those records with the service order flow generated via EASE. The system and the associated training is available today. Use of EASE obviates the need to develop entire new code sets and facilitates market entry for any CLEC, particularly those with limited information services capabilities. EASE contains over 1,000 edits that ensures a high percentage of error-free flow-through for service orders formatted by the system. EASE is offered as a way for CLECs (large or small) to quickly begin to electronically negotiate resale orders and efficiently transmit these orders to SWBT. As CLECs utilize EASE, SWBT will concurrently continue to work with CLECs on development of interfaces that operate using industry standards. This way the industry standard interfaces will have time to become as robust as EASE to best support significant order volumes over a wide array of services.

29. SWBT's EDI Gateway provides an electronic interface which conforms to the Ordering and Billing Forum/Telecommunications Interface Forum ("OBF/TCIF") national standard guidelines. As a baseline, SWBT's EDI Gateway currently supports OBF Local Service Ordering Guidelines (LSOG) Version 1 for the associated and developed TCIF/EDI standards. Further, SWBT has mutually negotiated and developed certain additional requirements in order to expedite CLEC needs in advance of standards. For the above, SWBT's EDI Gateway is now available to CLECs for testing with SWBT the ordering and provisioning of both resold services and unbundled network elements. This capability

enables the CLECs to electronically submit Local Service Requests (LSRs) to SWBT, receive acknowledgments, confirmations and completion status utilizing their own user interface. It is important to note that the EDI ordering processes are a new development to support an extremely complex task. Implementation of this interface depends on the mutual efforts of CLECs and SWBT. Functionality will evolve over time as CLECs fully employ their interface systems with capabilities available today in EASE. However, SWBT is committed to working with CLECs to expedite this effort. The physical connection between AT&T's and SWBT's data centers has been established for EDI transmission testing. We anticipate that AT&T will be ready to test sometime in the April 1997 time frame.

30. Specifically, SWBT's EDI Gateway currently enables the CLECs to perform conversions, new connects with straight line listings, changes of service, disconnects, and suspend order requests for resold services. National standards which will provide CLECs with an EDI capability for non-straight line directory listings, partial migrations and complex services are being developed. SWBT will incorporate these new national standards into its EDI gateway as soon as they are developed.
31. As previously stated, SWBT's EDI Gateway currently supports the ordering and provisioning of certain unbundled network elements. While national standards have yet to be fully developed for the ordering and provisioning of all unbundled network elements, SWBT has taken a proactive approach to incorporate the completed OBF/TCIF national

standards into its EDI Gateway. As a result, SWBT is providing CLECs with the capability of utilizing its EDI Gateway, to submit conversion, new connect, change, disconnect, outside move, and records change orders for unbundled local loops, interim number portability, and switch ports. As industry standards are defined and approved for other unbundled network elements, SWBT will incorporate those standards into its EDI Gateway. In fact, SWBT has committed to update its interface to support newly adopted OBF/TCIF standards within 120 days of their becoming final. SWBT is ready to make its EDI Gateway for Unbundled Network Elements available to CLECs to begin implementation and end-to-end testing efforts.

32. LEX is a graphical user interface being developed by SWBT for operation on WindowsTM that is based upon national OBF/LSR standards. It will allow CLECs to electronically create and transmit LSRs to SWBT, to receive acknowledgments and notification of error details from SWBT, and to track firm order confirmations and service order completion status of LSRs. LEX is an option for CLECs that do not have EDI capability. It will be available for use by CLECs in the second quarter of 1997.
33. SWBT also provides CLECs with an electronic interface to check on the status of a pending order that has been entered and accepted for processing: Order Status is a feature of the SWBT Toolbar (formerly known as Customer Network Administration) , which is a SWBT developed system that is available to CLECs today for checking the status of service orders, or to verify that a service order has been completed. SWBT Toolbar for

Trouble Administration is discussed in more detail in the maintenance and repair section of this affidavit.

34. SWBT provides CLECs with a capability to submit service orders by facsimile. As will be discussed in more detail in Ms. Lowrance's affidavit, CLECs can send service requests for resold services to SWBT by facsimile, where they will be entered into EASE by customer service representatives in the LSPSC.
35. There currently exists no means to electronically receive and process service requests for resold services of large business customers (i.e., those with over 30 lines) and certain complex serving arrangements (e.g. those that involve multiline hunting, trunk groups, DID trunks, etc.). SWBT's current process to handle these types of service requests for its own retail customers requires extensive manual coordination on the part of SWBT service representatives. CLECs will also need to contact the LSPSC in order to process such service requests (in the same manner as they are handled for SWBT customers).

Maintenance And Repair

36. Maintenance and repair involves the exchange of information which gives CLECs the capability to request repair of resold services and unbundled network elements, and to check on the status of these trouble reports. SWBT provides CLECs with several options for reporting trouble, and requesting maintenance and repairs. CLECs can call the LSPC, as will be discussed in more detail by Ms. Kramer in her affidavit. SWBT also provides

CLECs with a choice of two electronic interfaces for access to its OSS maintenance and repair capabilities for resold services or unbundled network elements: Trouble Administration from the SWBT Toolbar (formerly known as Customer Network Administration) and Electronic Bonding Interface ("EBI").

37. The Trouble Administration (TA) feature of the SWBT developed Toolbar application is currently used by SWBT retail business customers and interexchange carriers for maintenance and repair administration. TA has been enhanced and made available to CLECs so that they may electronically submit and check on the status of trouble reports. In addition, TA has the capability of initiating a mechanized loop test and receiving the test results for resold Plain Old Telephone Service (POTS) lines without initiating a trouble report. The test results will provide a direct current (DC) test which will reflect the ohms readings of the Tip to Ring, Tip to ground, and Ring to ground readings, and the alternating current readings (AC) for the same 3 measures. These readings will allow the CLEC to verify that the loop is balanced or determine that trouble is in the loop or wiring and equipment beyond the network interface device at the end user's premises. The test will also provide a capacitance reading so that the CLEC can determine how far out of the central office this loop is going. This test result will also provide an English statement as to the test verification results, such as "Test OK". TA will also provide trouble history to the CLEC for those POTS lines.

38. EBI is the industry standardized electronic interface conforming to ANSI standards for trouble reporting and obtaining status updates. It is currently in use by interexchange carriers for exchange access services trouble reporting. EBI has been enhanced by SWBT to enable CLECs to submit trouble reports, receive trouble status updates and closure information. In addition, in a number of interconnection agreements with CLECs, SWBT has agreed to assist in effecting changes through national standards to enhance EBI to provide additional functionality. These enhancements include the ability to perform feature and line option verification and request corrections, to perform network surveillance, to initiate and receive test results on resold services, to receive immediate notification of missed appointments, and to identify existing cable failures (by cable and pair numbering). A SWBT employee is the Resale Adhoc subcommittee chairperson at the Electronic Communications Implementation Committee (ECIC). This committee is addressing additional requirements support for trouble administration. Current issues being addressed include the ability to initiate and receive test results and trouble history on resold POTS services. The other aforementioned enhancements are yet to be addressed by ECIC.

Billing

39. Billing involves the exchange of information necessary for CLECs to bill their customers, to process the end user's claims and adjustments, and to view SWBT's bill for services provided to the CLEC. SWBT provides CLECs with a choice of four options for obtaining electronic access to billing information: Bill Plus TM, EDI, Customer Network